

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**In Re: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

This Document Relates to:

Brock Donnelly v. 3M Company et al., No. 2:20-cv-00209-RMG

Clinton Speers & Gail Speers v. 3M Company et al., No. 2:21-cv-03181-RMG

Kevin Voelker v. 3M Company et al., No. 2:18-cv-03438-RMG

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rules of Civil Procedure 56(c) and Case Management Order Nos. 26-G, and 26-J, Defendants' Co-Lead Counsel, on behalf of the *PI Bellwether* Defendants, submit this motion for summary judgment. As set forth in the accompanying memorandum of law, Defendants are entitled to (1) judgment on and dismissal of all claims asserted by Plaintiffs for lack of causation; (2) judgment on and dismissal of Plaintiffs' strict liability claims, reflected in Counts I, II, and III of each Plaintiff's complaint; (3) judgment on and dismissal of the misrepresentation claim asserted by Plaintiff Clinton Speers, reflected in Count V of Plaintiff Speers's Complaint; and (4) judgment on and dismissal of the loss of consortium claim asserted by Plaintiff Gail Speers, reflected in Count IX of Plaintiff Speers's Complaint.

Dated: June 17, 2025

Respectfully submitted,

/s/ Brian Duffy

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Defense Co-Leads

CERTIFICATE OF SERVICE

On June 17, 2025, I electronically submitted the foregoing document with the Clerk of Court, using the electronic case filing system of the Court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian Duffy
Brian Duffy